

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to consider  
policy and implementation refinements to  
the Energy Storage Procurement  
Framework and Design Program  
(D.13-10-040, D.14-10-045) and related  
Action Plan of the California Energy  
Storage Roadmap.

Rulemaking 15-03-011  
(Filed March 26, 2015)

**REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) ON  
ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENT ON  
WHETHER A NEW GENERAL ORDER IS NEEDED TO ESTABLISH A  
PRELIMINARY COMMISSION INSPECTION CHECKLIST FOR ENERGY  
STORAGE FACILITIES**

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November 7, 2016

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to consider policy and implementation refinements to the Energy Storage Procurement Framework and Design Program (D.13-10-040, D.14-10-045) and related Action Plan of the California Energy Storage Roadmap.

Rulemaking 15-03-011  
(Filed March 26, 2015)

**REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) ON  
ALJ'S RULING REQUESTING COMMENT ON WHETHER A NEW GENERAL  
ORDER IS NEEDED TO ESTABLISH A PRELIMINARY COMMISSION  
INSPECTION CHECKLIST FOR ENERGY STORAGE FACILITIES**

Pursuant to Judge Cooke's September 30, 2016 ruling ("ruling"), San Diego Gas & Electric ("SDG&E") submits these reply comments to address one point made in the comments of Pacific Gas & Electric Company ("PG&E"). PG&E's comments (at 1-2) state that to the extent the inspection protocol, whose terms limit its applicability to "storage devices at utility-owned sites," is intended to suggest that not all storage facilities used to help maintain utility service reliability will be subject to the same Commission treatment, the protocol should be modified. SDG&E agrees that the protocol should apply equally to all grid-connected storage facilities used to help maintain utility service reliability.

Respectfully submitted,

/s/ E. Gregory Barnes

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